

SB-1450-C

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dba Chrysler Capital

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

JOHN J. ZAPPILE, JR.

Case No. 24-10069 (JNP)

Chapter 13

OBJECTION TO CONFIRMATION

Santander Consumer USA Inc. dba Chrysler Capital (“Chrysler Capital”), a secured creditor of the Debtor, objects to the Debtor’s plan for the following reasons:

- a. The plan does not deal with/does not mention Chrysler Capital in regards to Chrysler Capital’s claim for the **2020 Jeep Wrangler**. Chrysler Capital objects, on the basis that if the plan were to complete early, and completes before the loan maturity date of the Debtor’s secured loan with Chrysler Capital, there is a risk that the Debtor will take the position that the loan with Chrysler Capital has been discharged under §1325. To resolve this issue, part 4(f) of the plan should be revised to state that the claim of Chrysler Capital is unaffected by the plan and will not be discharged upon completion of the plan.

/s/ William E. Craig

William E. Craig, attorney for
Santander Consumer USA Inc.
dba Chrysler Capital

Date: 3-18-24